


AO 91 (Rev. 11/82)

CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. DERRICK DECASHON CLARK, BRIAN DARION RATLIFF, CURTIS DAESHON CLARK, and JORDAN DEON MCCULLOUGH, Defendants.		DOCKET NO.	
		MAGISTRATE'S CASE NO. <div style="font-size: 1.5em; font-weight: bold;">18- 18MJ 01037</div> <div style="border: 1px solid black; padding: 2px; display: inline-block; text-align: center;"> <small>CLERK OF COURT</small> APR 27 2018 <small>CENTRAL DISTRICT OF CALIFORNIA</small> <small>BY DEPUTY</small> </div>	
Complaint for violation of Title 18, United States Code, Section 472			
NAME OF MAGISTRATE JUDGE HONORABLE		UNITED STATES MAGISTRATE JUDGE <div style="float: right; padding-top: -20px;">LOCATION Los Angeles, California</div>	
DATE OF OFFENSE February 6-8, 2018	PLACE OF OFFENSE Los Angeles County	ADDRESS OF ACCUSED (IF KNOWN)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: <div style="text-align: center; padding: 10px;"> [18 U.S.C. § 472: Uttering Counterfeit Obligations or Securities] <p>Between on or about February 6, 2018, and February 8, 2018, in Los Angeles County, Orange County, and Riverside County, within the Central District of California, defendants DERRICK DECASHON CLARK, BRIAN DARION RATLIFF, CURTIS DAESHON CLARK, and JORDAN DEON MCCULLOUGH, each aiding and abetting the other, acting with intent to defraud, possessed, passed, attempted to pass, and uttered counterfeit obligations and securities of the United States, namely, counterfeit \$100 Federal Reserve Notes, in violation of Title 18, United States Code, Section 472.</p> </div>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: <div style="text-align: center; padding: 10px;"> (See attached affidavit which is incorporated as part of this Complaint) </div>			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT 	
		OFFICIAL TITLE Patrick Fleurestant, Special Agent United States Secret Service	
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾ JOHN E. McDERMOTT			DATE 4/27/2018

⁽¹⁾ See Federal Rules of Criminal Procedure 3 and 54

AFFIDAVIT

I, Patrick Fleurestant, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of criminal complaints against and arrest warrants for DERRICK DECASHON CLARK ("DERRICK CLARK"), BRIAN DARION RATLIFF ("RATLIFF"), CURTIS DAESHON CLARK ("CURTIS CLARK"), and JORDAN DEON MCCULLOUGH ("MCCULLOUGH") (collectively the "Targets") for violations of Title 18, United States Code, Sections 472 (Passing, Attempting to Pass, and/or Uttering Counterfeit Federal Reserve Notes) and 371 (Conspiracy).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND FOR SPECIAL AGENT PATRICK FLEURESTANT

3. I am a Special Agent ("SA") with the United States Secret Service ("USSS"), and have been so employed since April 2016. Prior to my employment as an SA with USSS, I was an Officer with the United States Customs and Border Protection for

three years. I am currently assigned to the Counterfeit Squad of the USSS Los Angeles Field Office. I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center ("FLETC") in June 2016 and the Special Agent Training Course at the USSS Rowley Training Center ("RTC") in November 2016. During my time at FLETC and RTC, I was trained in conducting criminal investigations, including investigations into counterfeiting offenses. I have since conducted multiple investigations into the manufacturing, use, and distribution of counterfeit currency.

III. SUMMARY OF PROBABLE CAUSE

4. On multiple occasions in February 2018, DERRICK CLARK, RATLIFF, CURTIS CLARK, and MCCULLOUGH, each aiding and abetting the others, used and conspired to use counterfeit currency to purchase merchandise at retail chain stores. On at least two of those occasions, they later returned the merchandise to a different store of the same retail chain, accepting for the return genuine cash. In March 2018, DERRICK CLARK was arrested carrying on his person counterfeit currency bearing the same serial number as the counterfeit currency passed at the retail stores.

IV. STATEMENT OF PROBABLE CAUSE

5. From my investigation, which has included speaking to witnesses and officers, reviewing store records and surveillance video, and reading other reports, I know the following::

A. The Targets Have a Scheme to Purchase Merchandise with Counterfeit Currency and Return it for Genuine Currency

6. As described below in more detail, on several occasions since February 2018, the Targets have used counterfeit currency to purchase merchandise at retail stores. On approximately two of those occasions, they later returned or attempted to return their purchased merchandise for genuine currency. The Targets and their scheme came to my attention on February 9, 2018, after I learned that all four together had attempted to return merchandise to a Guitar Center store in Pasadena, California, that days earlier RATLIFF had purchased with counterfeit currency. My investigation has uncovered evidence of the same scheme occurring on several occasions.

B. The Targets Execute, and Attempt to Execute, That Scheme On Multiple Occasions

1. Neiman Marcus store purchase and return

7. On February 6, 2018, RATLIFF and CURTIS CLARK visited the Neiman Marcus store located at The Outlets at Orange, in Orange, California. I have reviewed records and video from this store. CURTIS CLARK bought two pairs of jeans for \$202.04, paying with two counterfeit \$100 bills and the remainder in genuine currency. RATLIFF bought a bomber jacket and two pairs of jeans for \$328.11, paying with three counterfeit \$100 bills and the remainder in genuine currency. The counterfeit bills

used by CURTIS CLARK and RATLIFF all bore the same serial number ending in "504C."¹

8. Both CURTIS CLARK and RATLIFF are visible in store surveillance video as they check out. I am familiar with their appearance from reviewing their California Department of Motor Vehicles ("DMV") photographs, speaking to people who have seen, met, and interviewed them, and seeing multiple surveillance videos of them in this investigation. Additionally, store records confirm the sales and show that an electronic receipt was sent to customer name "CURTIS CLARK" at email address "mkrdulow2400@icloud.com."

9. Two days later, on February 8, 2018, all four Targets together visited the Neiman Marcus store located at the Desert Hills Premium Outlets in Cabazon, California. I have reviewed records and video from this store. CURTIS CLARK and RATLIFF returned the exact merchandise they had purchased two days earlier, and received genuine currency in cash for the return (\$202.04 for CURTIS CLARK and \$328.11 for RATLIFF).

10. Store surveillance video captures CURTIS CLARK and RATLIFF making the return at a register, and DERRICK CLARK and MCCULLOUGH were standing with them, watching the employee provide the cash in return. DERRICK CLARK was wearing a blue Jays baseball hat, and that hat was found the next day in a car he occupied and admitted to driving, along with the Neiman

¹ I have examined this counterfeit currency and all other counterfeit currency referenced in this affidavit, and I believe, based on my training and experience, that all currency described herein as "counterfeit" is indeed counterfeit.

Marcus paper receipts from the return, as described in more detail below.

2. Guitar Center store purchase and attempted return

11. On February 7, 2018, all four Targets together visited the Guitar Center store located at 10831 West Pico Boulevard in West Los Angeles. I have reviewed records and video from this store. DERRICK CLARK, using the name "Syncre Jones" and a Guitar Center Account assigned to that name, bought a professional-caliber turntable for \$931.00, paying with \$900 in counterfeit \$100 bills and the remainder in genuine currency. RATLIFF, using the name "Chris Rogers" and a Guitar Center account assigned to that name, bought an LED stage light fixture for \$226.08, paying with \$200 in counterfeit currency and \$26.08 in genuine currency.

12. Store records confirm the sales to "Syncre Jones" and "Chris Rogers." The store manager has told me that the purchases were made while four people stood together at the register. Specifically, the store manager told me that all four individuals were standing at the register together when the merchandise was presented for purchase and when the first transaction was made. Then, after the first transaction was completed, two of the individuals left with the item purchased. After the second transaction was completed, the other two individuals left with the other item purchased.

13. I believe that the four individuals at the register together are the four Targets, and not four other people, for several reasons. First, surveillance video at the entrance to

the store shows the same four people from the Neiman Marcus transaction entering and then exiting the store around the time of the transaction. On the video, all four Targets entered the store together, but then they exited in pairs, as described by the store manager: DERRICK CLARK, carrying what appears to be the turntable, first exited with MCCULLOUGH; and then a few minutes later RATLIFF, carrying what appears to be the stage light fixture, exited with CURTIS CLARK. Surveillance video was not available to show the Targets at the cash register making the transaction, but the store manager's memory is consistent with the video.

14. The appearance of the people in the video resembles the appearance of the Targets in their DMV photographs, and the four people in the video have the same body types and wore the same clothing as the four individuals who visited the Bally store, Balenciaga store, and the Pasadena Guitar Center store, as described elsewhere in this affidavit. For example, in this surveillance video from the West Pico Guitar Center, MCCULLOUGH was wearing red and white-colored sneakers, and MCCULLOUGH can later be seen in surveillance video wearing the same sneakers at the Balenciaga store. For another example, the tallest of the four was wearing a blue baseball hat that appears to bear the Blue Jays logo, and DERRICK CLARK was seen at other times wearing such a hat and he was later arrested with such a hat, and I know from the Targets' DMV reports that DERRICK CLARK is the only one of the four who is taller than five feet and ten inches.

15. Additionally, the receipt for the turntable purchase was later found in DERRICK CLARK's car. Finally, all of the counterfeit bills passed share the same serial number, and it is also the same serial number on the bills passed at Neiman Marcus one day earlier.

16. Later the same day, DERRICK CLARK and RATLIFF visited the Guitar Center located at 7425 Sunset Boulevard in Hollywood. I have reviewed records and video from this store. They attempted to return for cash both items they purchased earlier in the day. RATLIFF was successful; he returned his stage light fixture and received \$226.08 in genuine currency, confirmed in store records and from a cashier's statement. DERRICK CLARK was not successful. The cashier told DERRICK CLARK that he could not receive cash for his purchase over \$250, but if he could present identification then the store could issue him a check for the refund. DERRICK CLARK said he did not have identification, and asked if they could issue the check in someone else's name. The cashier told him no. DERRICK CLARK then left with the turntable.

17. The return was captured by surveillance cameras, and both RATLIFF and DERRICK CLARK are plainly visible in high-quality video. Additionally, the cashier recalled that DERRICK CLARK had a "broken-heart tattoo by his eye." I know from DERRICK CLARK's DMV photograph that he has a broken heart tattoo by his eye.

3. Bally store purchase

18. On February 8, 2018, all four Targets visited the Bally store located at the Desert Hills Premium Outlets in Cabazon, California. I have reviewed records and video from this store. DERRICK CLARK bought a belt for \$226.28 and paid with \$200 in counterfeit currency and \$40 in genuine currency. RATLIFF bought a belt for \$210.11, paying with \$300 in counterfeit currency and 11 cents in genuine currency.

19. Store records confirm the sales. Both belts were later recovered from DERRICK CLARK's car, along with both purchase receipts, as described further below. Four of the counterfeit bills contained the same serial number as the counterfeit bills passed at Neiman Marcus and Guitar Center.

20. Surveillance video at the Bally store shows a tall skinny black male purchasing a belt, and then, about ten minutes later, three black males entering and browsing. Eventually, two of the three males depart the store, and the third purchases a belt. The video is fairly clear, and while maybe not clear enough to identify specific facial features, it is definitely clear enough to see hair cuts, body types, and clothing, all of which is consistent with the four Targets in every other surveillance video. DERRICK CLARK appears to be wearing the same Blue Jays hat.

4. Zumiez store purchase

21. On February 8, 2018, all four Targets visited the Zumiez store located at the Desert Hills Premium Outlets in Cabazon, California. I have reviewed records from this store.

DERRICK CLARK bought jeans and a shirt for \$91.40, using one \$100 counterfeit bill and .50 cents in genuine currency. He received change of \$9.02 in genuine currency. RATLIFF bought jeans, a shirt, and a pair of shoes for \$174.39, using \$200 in counterfeit currency. RATLIFF received change of \$25.61 in genuine currency.

22. DERRICK CLARK and RATLIFF were identified by a store manager who saw both DERRICK CLARK and RATLIFF and described distinct tattoos that they bear. DERRICK CLARK bears a broken heart tattoo beneath his left eye on his cheekbone, and RATLIFF bears a distinct tattoo on the back left of his neck. I am familiar with both tattoos from review of their DMV photographs. Additionally, the counterfeit bills used bear the same serial number (504C) as the ones passed at the other locations. Finally, the purchased items, with the purchase receipts, were later recovered from DERRICK CLARK's car when he was arrested later the same day, with the items and receipts still in "Zumiez" bags, as described further below.

5. Balenciaga store purchase and attempted purchase

23. On February 8, 2018, CURTIS CLARK and MCCULLOUGH visited the Balenciaga store located at the Desert Hills Premium Outlets in Cabazon, California. I have reviewed records and video from this store. CURTIS CLARK bought one pair of shoes for \$440.70, using \$400 in counterfeit currency and \$41 in genuine currency. He received change of 0.30 cents in genuine currency. MCCULLOUGH attempted to make a purchase but the cashier identified the cash presented by MCCULLOUGH as possibly

counterfeit, and MCCULLOUGH left the store with the counterfeit currency. Store surveillance video shows MCCULLOUGH handing the money to the cashier, the cashier placing the money into a counterfeit detection machine, and then the cashier putting the money back on top of the counter. MCCULLOUGH then took the money from the top of cash register and left the store without the merchandise he was attempting to purchase.

24. When CURTIS CLARK made his purchase, he signed up for a Balenciaga membership. He handwrote into the application his true name, his true address, and his true birthdate. He declined to list a phone number, but wrote his email as "mkrdulow2400@icloud.com," which is the same email he used when making the Neiman Marcus purchase described above.

25. Store surveillance video shows an individual who appears to be CURTIS CLARK filling out the application. It also shows CURTIS CLARK browsing and then standing at the register with another individual who is wearing a dark-colored hooded sweatshirt with the hood pulled up and bright red shoes. I identified this other individual as MCCULLOUGH by comparing his appearance in the surveillance video to his appearance in his DMV photograph and other surveillance videos viewed in this investigation. For example, in the video from the Pasadena Guitar Center, MCCULLOUGH is identifiable wearing a dark-colored hooded sweatshirt and bright red shoes, and he wore the same dark-colored hooded sweatshirt and bright red shoes in this Balenciaga video.

26. The purchased shoes, with the receipt, were later recovered from DERRICK CLARK's car. The shoes and receipt were still in a "Balenciaga" bag.

C. Targets Attempt a Return At Guitar Center And DERRICK CLARK Is Caught With Evidence of Other Purchases

27. Still on February 8, 2018, all four Targets visited the Guitar Center Store located at 2660 East Colorado Boulevard in Pasadena. They attempted again to return the turntable purchased for \$931.00. The Guitar Center employee, having seen a workplace email identifying a transaction number and surveillance video image captures of the face of RATLIFF and the backs of four black males, asked them to wait. He went into an office and confirmed that the transaction was the one identified in the email, and one of the people attempting the return appeared to be one of the people in the photographs.

28. A Pasadena police officer happened to be present, and the employee notified the officer of what was then transpiring. That officer arrested RATLIFF at the register, and the three other Targets were arrested by other officers within blocks of the Guitar Center.

29. All four Targets are clearly visible in surveillance video. For most of the time, RATLIFF is at the return register, next to MCCULLOUGH. DERRICK CLARK lurked nearby, keeping an eye on what was happening, until he joined them at the register. CURTIS CLARK also joined them at the register minutes later. Both RATLIFF's and DERRICK CLARK's unique tattoos are visible in the video.

30. When DERRICK CLARK was later searched incident to arrest, a Pasadena police officer found a single counterfeit \$100 bill in DERRICK CLARK's front pocket that bore the same serial number as the majority of the bills passed at all stores.

31. Officer Garcia asked DERRICK CLARK for consent to search the car, and DERRICK CLARK gave consent. DERRICK CLARK said that the car did not belong to him, but he had been driving it (the car was registered to "Shah Bakul" in La Palma, and officers later had it towed and impounded). Officers then searched the car and found:

a. Much of the merchandise and receipts described above, such as the receipts from Neiman Marcus, the belts from Bally, and the shoes, receipt, and bag from Balenciaga.

b. A hooded sweatshirt that resembled the hooded sweatshirt worn by RATLIFF, as captured in a photograph, at the Guitar Center store in Hollywood. In the same photograph, DERRICK CLARK is seen wearing the same baseball cap that he was wearing when he was arrested.

c. A "Prisoner's receipt" and inmate's² "Receipt for Property Taken Into Custody" listing the charge as possession of counterfeit currency and the property as counterfeit \$100 bills with a serial number ending in 504C, the same as the serial

² The name listed on the inmate's receipt was "Antony Brown," and a similar name of "Antonio Brown" was on the "prisoner's receipt." DERRICK CLARK, during an interview described, claimed that all of the counterfeit currency belonged to his brother Antonio Brown.

number on the majority of counterfeit bills passed by the Targets.

32. Officers conducted a field line-up with the assistant manager at the Guitar Center, "Gomez."³ Gomez saw RATLIFF and identified him as "the one who actually brought in the gear." He said about DERRICK CLARK, "Yes, that's the guy. He's actually in the photo as well with the hat." About MCCULLOUGH, Gomez said "Yeah, that looks like the other suspect," and about CURTIS CLARK, he said, "Yup, I remember, I definitely seen this guy." Gomez described, "This guy [MCCULLOUGH] here was leaving with another dude [CURTIS CLARK]. There was supposed to be four of them, but these are the two that walked out first." About the four of them, Gomez said that "They were all hanging out."

D. DERRICK CLARK is Arrested with Counterfeit Currency Bearing the Same Serial Number As Counterfeit Currency Passed at the Retail Stores

33. On March 21, 2018, DERRICK CLARK was stopped by a Los Angeles Sheriff's Deputy at an East Los Angeles train station, after not being able to provide proof of fare. DERRICK CLARK told the Deputy that he was on parole, the Deputy confirmed that it was true, and then the Deputy searched DERRICK CLARK and found \$1,100 in counterfeit \$100 bills. Those bills contained the same serial number as the bills that were passed in every instance described above (504C), with the exception of one bill passed at the Bally store and four bills passed at the Balenciaga store.

³ Gomez had previously seen photographs of RATLIFF and DERRICK CLARK that were taken at the Guitar Center in Hollywood.

34. DERRICK CLARK, when interviewed (after being Mirandized), denied that he knew anything about counterfeit currency. However, it appeared as if he had deliberately separated the counterfeit currency from genuine currency in his pockets: he possessed the \$1,100 in counterfeit currency in one pants pocket and genuine currency in another pants pocket.

V. CONCLUSION

35. For the reasons described above, there is probable cause to believe that DERRICK CLARK, RATLIFF, CURTIS CLARK, and MCCULLOUGH possessed, passed, attempted to pass, and uttered counterfeit currency, and conspired to do so, in violation of 18 U.S.C §§ 472 and 371.

/s/
PATRICK FLEURESTANT, Special
Agent, United States Secret
Service

Subscribed to and sworn before
me
this 27 day of April, 2018.

JOHN E. McDERMOTT

UNITED STATES MAGISTRATE JUDGE